

Attachment 3
Errors in ConocoPhillips' Title V Permit

Issue Number	Source	Section and Table Number	Listed Requirement	Permit Page Number	Change to Permit and Rationale
1	S-126 (Tk 172)	II-A	Make or Type	9	Change tank description from "External Floating Roof" to "Internal Floating Roof with Dome" to match heading in Table VII-B10.
2	S-257 (Tk 1004)	II-A	Make or Type	10	Change tank description from "External Floating Roof" to "Internal Floating Roof with Dome" to match heading in Table VII-B10.
3	S-258 (Tk 1005)	II-A	Make or Type	10	Change tank description from "External Floating Roof" to "Internal Floating Roof with Dome" to match heading in Table VII-B10.
4	S-319 (U-215 Gasoline Fractionation)	II-A	Capacity	10	Change daily capacity from 7500 bbl/day, which is too low, to 9,600 bbls/day, which is the capacity. This source is grandfathered with no permit limits and has an annual limit of 4.32 E 6 bbls.
5	Various heaters	Sections IV and VII, Tables A.1 to A.18, A.20 to A.25, A.28 to A.3	9-10-301	Multiple	Change "federally enforceable" column to "N". This requirement is currently marked as federally enforceable, but Rule 9-10-301 is not federally enforceable, so the "federally enforceable" column of the tables should be changed to "N" throughout the permit for all references to Rule 9-10-301.
6	Various heaters	Section IV, Tables A.24, A.25, A.30, A.31, A.32, A.33	NSPS 40 CFR 60 Appendix F	77, 80, 89, 92, 95, 97	Delete this requirement. NSPS Appendix F does not apply to H2S fuel gas monitors.

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7	S-324 (API Oil-Water Separator)	IV-C	60.693-2, 60.693-2(a), 60.693-2(a)(2), 60.693-2(a)(5)(i), 60.693-2(a)(5)(ii), 60.693-2(c) 60.693-2(d)	102 and 103	Delete each of these requirements. The oil-water separator complies with the fixed roof tank requirements of NSPS Subpart QQQ in 40 C.F.R. § 60.692-3 and it is not subject to these alternative requirements that apply to floating roof tanks.
8	S-294 (Gas Dispenser)	IV-K	PC 7523 (and PC 18680)	113	The table contains an apparent typographical error – it lists BAAQMD permit condition 7523 twice. The second listing, which contains sublistings for Part 1 and Part 2, should be changed to “BAAQMD Condition 18680.”
9	S-307 (U-240), S-308 (U-244)	IV-N	PC 20620, Part 2	117	Permit condition 20620, Part 2 requires submission of an “Operation, Maintenance, and Monitoring Plan,” not a “Startup, Shutdown, and Malfunction Plan” as currently specified. The text of the requirement should be changed accordingly.
10	S-350 (U-267)	IV-O	PC 383, Part 1b	119	Delete the word “Daily” from the description of the requirement. As stated in Section IV of the permit, permit condition 383, Part 1b requires a crude analysis for each tanker shipment or pipeline delivery, and does not require a daily analysis.
11	S-301, S-302, S-303, S-1001, S-1002, S-1003 (Sulfur Plant & Pits)	IV-U	PC 20620, Part 2	137	Permit condition 20620 Part 2 requires submission of an “Operation, Maintenance, and Monitoring Plan,” not a “Startup, Shutdown, and Malfunction Plan” as currently specified. The text of the requirement should be changed accordingly.

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12	S-300 (U-200)	VI-Permit Conditions	PC 476	253	Add a heading to permit condition 476 to clarify that permit condition applies to S-300.
13	S-296 (Main Flare)	VI-Permit Conditions	PC 18255, Part 3	270	Change permit condition 18255, Part 3 to specify that it applies only to S-398 because S-296 is not subject to NSPS Subpart J which is the basis for this condition.
14	S-294 (Gas Dispenser)	VI-Permit Conditions	PC 18680	275	Add a heading to permit condition 18680 to clarify that the condition applies to S-294.
15	S-50, S-51, S-52	VI-Permit Conditions	PC 19488	277	Delete the references to S-53, 54, 55, 56, 57, and 58 from the heading above Parts 1 and 2 of permit condition 19488, because these parts apply only to S-50, S-51, and S-52.
16		VI-Permit Conditions	PC 20620, Part 1	278	Change the date in the basis from "April 11, 2004" to "April 11, 2005," to correctly reflect the date that NSPS Subpart UUU becomes effective.
17	S-305 (U-230)	VI-Permit Conditions	PC 20989	281	Change the annual limit for S-305 to 9.23 E 6 bbls instead of 9.21 E 6 bbls. The limit is based on the daily capacity of 25300 bbls, multiplied times 365 days, which equals 9,234,500.
18	All Sources	VII-All Sources Facility Specific Generally Applicable Requirements	NSPS Subpart Kb 60.112b(a)(2) and NESHAP Subpart CC 63.647(a)	284	Delete "NESHAP Subpart FF 61.350, 61.356(k) and 61.357(d)(8)" from the "Monitoring Requirement Citation" column. When making revisions to the draft Title V permit, the District correctly removed NESHAP Subpart FF 61.342(a)(2) from the "Citation" column but did not remove these corresponding monitoring requirements.
19	Various heaters	Section VII, Tables A.1 to A.18, A.20 to A.25, A.28 to A.33	PC 1694, Part A1	Multiple	Change "federally enforceable" column to "N". This requirement is currently marked as federally enforceable, but as indicated in Section IV of the permit, condition 1694, Part A1 is not federally enforceable.

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20	S-15 (U-244, B-501)	VII-A.13	PC 20989	303	Change the throughput (permit condition 20989, Part A) from an individual limit of 6.0 E 6 therms/yr to a group limit of 19.9 E 6 therms/yr for S-15, S-16, S-17, S-18, and S-19 to be consistent with the limit contained in permit condition 20989 in Section VI of the permit (see page 279).
21	S-16 (U244, B-502)	VII-A.14	PC 20989	304	Change the throughput (permit condition 20989, Part A) from an individual limit of 6.7 E 6 therms/yr to a group limit of 19.9 E 6 therms/yr for S-15, S-16, S-17, S-18, and S-19 to be consistent with the limit contained in permit condition 20989 in Section VI of the permit (see page 279).
22	S-17 (U244, B-503)	VII-A.15	PC 20989	305	Change the throughput (permit condition 20989, Part A) from an individual limit of 4.7 E 6 therms/yr to a group limit of 19.9 E 6 therms/yr for S-15, S-16, S-17, S-18, and S-19 to be consistent with the limit contained in permit condition 20989 in Section VI of the permit (see page 279).
23	S-18 (U244, B-504)	VII-A.16	PC 20989	306	Change the throughput (permit condition 20989, Part A) from an individual limit of 1.9 E 6 therms/yr to a group limit of 19.9 E 6 therms/yr for S-15, S-16, S-17, S-18, and S-19 to be consistent with the limit contained in permit condition 20989 in Section VI of the permit (see page 279).
24	S-19 (U244, B-505)	VII-A.17	PC 20989	308	Change the throughput (permit condition 20989, Part A) from an individual limit of 0.6 E 6 therms/yr to a group limit of 19.9 E 6 therms/yr for S-15, S-16, S-17, S-18, and S-19 to be consistent with the limit contained in permit condition 20989 in Section VI of the permit (see page 279).

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25	Various tanks	Section VII, Tables B.7, B.9, B.10, B.13, B.14, B.16, B.17, B.18, B.19, B.20, B.23B	BAAQMD 8-5-501.2	Multiple	Change monitoring frequency from "Periodic after each tank seal inspection" to "Periodic after each tank seal <u>replacement</u> ". Table VII-B.6 shows the correct monitoring frequency for this citation.
26	S-324 (API)	VII-C	NSPS Subpart QQQ, 40 CFR 60.693-2(a)(2)	334	Delete this requirement – it applies only to oil-water separators subject to floating roof standards. The refinery's separator complies with the fixed roof tank standards and is not subject to the floating roof tank standards.
27	S-350 (U-267)	VII-O	PC 383, Part 1a	343	Change monitoring frequency from P/D to P/E for PC 383, Part 1b. As stated in Section IV of the permit, permit condition 383, Part 1b requires a crude analysis for each tanker shipment or pipeline delivery, and does not require a daily analysis.